IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Amanda Lopez-Perez and

CASE NO.: 5:20-bk-01632-RNO

Anton Perez

Debtor.

CHAPTER 7

Amanda Lopez-Perez and Anton Perez,

Movant,

v.

11 U.S.C. 722

Ally Financial and John J. Martin, Trustee

Respondent.

STIPULATION RESOLVING MOTION FOR AUTHORITY TO REDEEM PERSONAL PROPERTY UNDER 11 U.S.C. § 722

The parties hereby stipulate as follows:

- 1. Debtor filed a Voluntary Petition under Chapter 7 of the Bankruptcy Code on May 27, 2020.
- 2. Debtor owns tangible personal property (the "Property") intended primarily for personal, family, or household use, more particularly described as follows:

Year: 2017

Make: Mitsubishi Model: Outlander

VIN # JA4AR3AU1HZ016173

- 3. Debtor filed a Motion to Redeem this Property on July 13, 2020.
- 4. Respondent Ally Financial Inc. filed an Answer on July 27, 2020.
- 5. Respondent John J. Martin did not file a response.
- 6. Debtor and Respondent Ally Financial Inc. intend to resolve this Motion through this Stipulation and request the Court enter the attached Order.

7. For the purposes of this Motion, the parties agree that the redemption value of the property shall be \$9,000. Said payment shall be forwarded to: Payment Processing Center, PO Box 9001951, Louisville, KY 40290-1951. The account number must be written on the check.

Date: August 6, 2020

Respectfully submitted,

/s/ Patrick J. Best Patrick J. Best, Esq. Attorney ID: 309732 ARM Lawyers 18 N. 8th St. Stroudsburg PA 18360 570-424-6899

Date: August 13, 2020

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